

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MONDAIRE JONES, *et al.*,

Plaintiffs,

- against -

UNITED STATES POSTAL SERVICE, *et al.*,

Defendants.

**No. 20 Civ. 6516 (VM)**

**DECLARATION OF  
REBECCA S. TINIO**

Rebecca S. Tinio, pursuant to the provisions of 28 U.S.C. § 1746, declares, under penalty of perjury, as follows:

1. I am an Assistant United States Attorney in the office of Audrey Strauss, Acting United States Attorney for the Southern District of New York, attorney for defendants the United States Postal Service, Louis DeJoy, as Postmaster General of the United States Postal Service, and Donald J. Trump, as President of the United States. I am one of the attorneys assigned to the defense of this matter.

2. I submit this declaration in support of Defendants' opposition to Plaintiffs' motion for a preliminary injunction.

3. Attached hereto as Exhibit 1 is a true and correct copy of the United States Postal Service *FY2019 Annual Report to Congress*, available at <https://about.usps.com/what/financials/annual-reports/fy2019.pdf> (last visited Sept. 7, 2020).

4. Attached hereto as Exhibit 2 is a true and correct copy of an article titled *Can the Post Office Handle Election Mail? Why the Recession Could Actually Help*, available at <https://about.usps.com/newsroom/national-releases/2020/0807-pmg-bog-meeting-comments.htm> (*N.Y. Times*, Aug. 20, 2020) (last visited Sept. 8, 2020).

5. Attached hereto as Exhibit 3 is a true and correct copy of Postmaster General Louis DeJoy's Opening Remarks for the USPS Board of Governors Aug. 7 Meeting, *available at* <https://about.usps.com/newsroom/national-releases/2020/0807-pmg-bog-meeting-comments.htm> (last visited Sept. 7, 2020).

6. Attached hereto as Exhibit 4 is a true and correct copy of United States Postal Service Office of Inspector General ("OIG") Audit Report No. 20-225-R20, *Processing Readiness of Election and Political Mail During the 2020 General Elections*, *available at* <https://www.uspsoig.gov/document/processing-readiness-election-and-political-mail-during-2020-general-elections> (Aug. 31, 2020) (last visited Sept. 7, 2020).

7. Attached hereto as Exhibit 5 is a true and correct copy of a transcript of a hearing held by the Senate Homeland Security and Governmental Affairs Committee on USPS Operations During COVID-19 and the Elections (Aug. 21, 2020).

8. Attached hereto as Exhibit 6 is a true and correct copy of *Your 2020 Official Election Mail Kit 600*, *available at* <https://about.usps.com/kits/kit600.pdf> (last visited Sept. 7, 2020).

9. Attached hereto as Exhibit 7 is a true and correct copy of *State and Local Election Mail – User's Guide (Publication 632)*, *available at* <https://www.usps.com/election-mail/pub632.pdf> (last visited Sept. 8, 2020).

10. Attached hereto as Exhibit 8 is a true and correct copy of *Official Election Mail – Graphic Guidelines and Logos (Publication 631)*, *available at* <https://about.usps.com/publications/pub631.pdf> (last visited Sept. 8, 2020).

11. Attached hereto as Exhibit 9 is a true and correct copy of the Oral Statement of Postmaster General Louis DeJoy Before the House Committee on Oversight and Reform,

*available at* <https://about.usps.com/newsroom/national-releases/2020/0824-oral-statement-of-pmg-louis-dejoy-before-the-house-committee-on-oversight-and-reform.htm> (Aug. 24, 2020) (last visited Sept. 8, 2020).

12. Attached hereto as Exhibit 10 is a true and correct copy of Postmaster General Louis DeJoy Statement, *available at* <https://about.usps.com/newsroom/national-releases/2020/0818-postmaster-general-louis-dejoy-statement.htm> (Aug. 18, 2020) (last visited Sept. 8, 2020).

13. Attached hereto as Exhibit 11 is a true and correct copy of a document titled *First-Class Mail Volume Since 1926*, *available at* <https://about.usps.com/who-we-are/postal-history/first-class-mail-since-1926.pdf> (last visited Sept. 8, 2020).

14. Attached hereto as Exhibit 12 is a true and correct copy of the Statement of Postmaster General and Chief Executive Officer Megan J. Brennan Before the House Committee on Oversight and Reform, *available at* [https://about.usps.com/news/testimony/2019/pr19\\_pmg0430.pdf](https://about.usps.com/news/testimony/2019/pr19_pmg0430.pdf) (Apr. 30, 2019) (last visited Sept. 8, 2020).

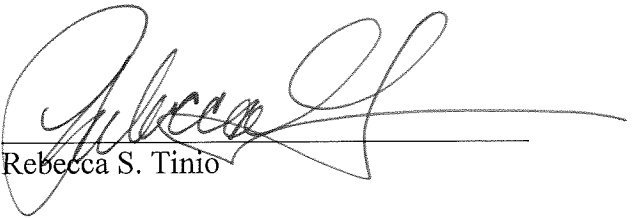
15. Attached hereto as Exhibit 13 is OIG Audit Report No. 19XG013NO000-R20, *U.S. Postal Service's Processing Network Optimization and Service Impacts*, *available at* <https://www.uspsoig.gov/document/us-postal-service%E2%80%99s-processing-network-optimization-and-service-impacts> (June 16, 2020) (last visited Sept. 8, 2020).

16. Attached hereto as Exhibit 14 is a true and correct copy of a transcript of a hearing held by the House Oversight and Reform Committee on Postal Service Operational Changes (Aug. 24, 2020).

17. Attached hereto as Exhibit 15 is a true and correct copy of the Statement of Postmaster General and Chief Executive Officer Louis DeJoy Before the House Committee on Oversight and Reform, *available at* <https://about.usps.com/newsroom/testimony-speeches/082420-pmg-statement.htm> (Aug. 24, 2020) (last visited Sept. 8, 2020).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
September 8, 2020



Rebecca S. Tinio